

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HUGHES RIVER FM, LLC,  
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,  
a Cayman Islands corporation,  
YU JIANJUN, an individual,  
SEAMAN YU, an individual,  
XIAOYU CHEN, an individual,  
LI HAIBO, an individual,  
and TENCENT MUSIC ENTERTAINMENT  
GROUP, INC., a Cayman Islands  
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**NOTICE OF MOTION TO FILE DOCUMENTS UNDER SEAL**

**PLEASE TAKE NOTICE** that on September 4, 2025 at 8:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Edmund E. Chang, or any judge sitting in his stead, in Courtroom 2341, in the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604, and then and there present the **MOTION TO FILE DOCUMENTS UNDER SEAL**, a copy of which is attached and hereby served upon you.

Dated: August 27, 2025

RESPECTFULLY SUBMITTED,

By: /s/ Vincent Filardo, Jr.

Vincent Filardo, Jr. (*pro hac vice*)

Andrew Sklar (*pro hac vice*)

Yi He (*pro hac vice*)

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*Counsel for Defendant Ximalaya, Inc.*

## **CERTIFICATE OF SERVICE**

I, Vincent Filardo, Jr., certify that on August 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all registered users.

Dated: August 27, 2025

By: /s/ Vincent Filardo, Jr.